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STATES DISTRICT COURT

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# UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS[02] FEB - | PM 4: | 7 DALLAS DIVISION

ATLANTIC SPECIALTY INSURANCE	§
COMPANY,	§ 8
Plaintiff,	§
	§ CIVIL ACTION NO. 3:20-cv-02478
v.	§
	§
DELMA JEFFERSON,	§
	§
Defendant.	§
	§
	<b>§</b>

NOTICE OF MOTION AND MOTION OF DEFENDANT TO DISMISS PLAINTIFF'S

COMPLAINT FOR LACK OF PERSONAL JURISDICTION, UNDER FEDERAL RULES OF

CIVIL PROCEDURE 12(b)(2)

## TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on, 2021, at a.m., or as
soon thereafter as the matter may be heard, in the courtroom of the Honorable
, located in the United States Courthouse, Dallas, Texas, Defendant
Delma Lamar Jefferson, specially appearing, will, and hereby does, move this Court
pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, for an order
dismissing without leave to amend claims raised against him in the Complaint filed by
Plaintiff Atlantic Specialty Insurance Company in the above-captioned matter.
Mr. Jefferson seeks dismissal pursuant to Federal Rule of Civil Procedure 12(b)(2) on
NOTICE OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION Page 1

the grounds that this Court lacks personal jurisdiction over him because he does not have sufficient contacts with the State of Texas to support an exercise of general or specific jurisdiction.

Defendant is entitled as a matter of law to an order dismissing the Complaint identified above, without leave to amend. This Motion is based on this Notice of Motion and Motion, the concurrently filed Memorandum of Points and Authorities, the accompanying Declaration of Delma Lamar Jefferson, any exhibits thereto filed concurrently herewith, all of the pleadings, files, and records in this action, all other matters of which the Court may take judicial notice, and the argument and evidence that may be presented to or considered by the Court prior to its ruling.

Respectfully submitted,

**DELMA LAMAR JEFFERSON**, In Pro Per 5200 Quick Court Elk Grove, CA 95757

Delma Lamar Jefferson

#### **CERTIFICATE OF SERVICE**

This will certify that on the 29th day of January December 2021, a copy of the attached document Motion was also sent via Email to the following recipient:

Brett A. Wallingford Attorney for Plaintiff bwallingford@zelle.com

Steven I. Hochfelsen

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# UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

ATLANTIC SPECIALTY INSURANCE COMPANY,  Plaintiff,  v.  DELMA JEFFERSON,  Defendant.	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	/IL ACTION NO. 3:20-cv-02478
ORDI	<u>R</u>	
COMES NOW, Defendant Delma Lamar J	efferson	's Motion to Dismiss under Federal
Rules of Civil Procedure 12(b)(6) for Lack of Pers	onal Jur	risdiction. After considering the
Motion, the files, records and pleadings in this acti	on and	the declarations and affidavits
supporting and opposing the motion, this Court fir	ds that	it lacks personal jurisdiction over
Defendant, Delma Lamar Jefferson in Dallas, Texa	s.	
IT IS THEREFORE ORDERED, ADJUDO	iED, an	d DECREED that Plaintiff's Motion to
dismiss is hereby GRANTED.		
SIGNED THISDAY OF		, 2021.
DIST	RICT J	UDGE

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